UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
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AUG 12 2016

REPLY TO THE ATTENTION OF:
E-19J

Marisol R. Simon
Regional Administrator
Federal Transit Administration
200 West Adams Street, Suite 320
Chicago, Illinois 60606

Kathryn O'Brien
Assistant Director
Environmental and Agreements
Metro Transit – BLRT Project Office
5514 West Broadway Avenue, Suite 200
Crystal, Minnesota 55428

Re: Final Environmental Impact Statement – METRO Blue Line Light Rail Transit (BLRT) Extension, Hennepin County, Minnesota. CEQ # 20160155

Dear Ms. Simon and Ms. O'Brien:

The U.S. Environmental Protection Agency (EPA) has reviewed the Federal Transit Administration's (FTA) July 2016, Final Environmental Impact Statement (FEIS) for the Metropolitan Council's (Council) proposed METRO Blue Line Light Rail Transit (BLRT) Extension Project (formerly called the Bottineau Transitway LRT Project). Our comments are provided pursuant the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Council proposes to construct and operate an approximately 13-mile extension of the METRO Blue Line, starting from downtown Minneapolis to the northwest area of the Twin Cities, serving north Minneapolis and the suburbs of Golden Valley, Robbinsdale, Crystal, and Brooklyn Park. The FEIS Preferred Alternative (Proposed BLRT Extension Project) is a refined version of the Draft EIS (DEIS) locally preferred alternative (LPA).

EPA commented on the 2014 Draft EIS (DEIS) on May 27, 2014. We rated the DEIS as Environmental Concerns – Insufficient Information (EC-2). Our comments and recommendations were for additional analysis regarding the vulnerability of water resources and biological resources. In order to fully protect the environment, we recommended additional avoidance, minimization and compensation mitigation measures be identified in the Final EIS (FEIS).

Our review of the FEIS indicates that many of our earlier comments and recommendations have been satisfactorily address. However, EPA recommends FTA's Record of Decision (ROD) better address wetlands and stormwater management, wildlife crossing locations, tree mitigation and identification of measures to decrease the exposure of air toxics during project construction. See the enclosure for our detailed comments.

EPA requests one hard copy and 2 DVDs of FTA Record of Decision, when available. If you have any questions regarding this letter, please contact Virginia Laszewski of my staff at 312/886-7501 or at laszewski.virginia@epa.gov.

Sincerely,

Kathleen Joyal

for Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure (1)

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EPA Comments - Federal Transit Administration (FTA) Final Environmental Impact Statement (FEIS) – METRO Blue Line Light Rail Transit (BLRT) Extension (formerly Bottineau Transitway), Hennepin County, Minnesota. CEQ # 20160155

FEIS Preferred Alternative (Proposed BLRT Extension Project): The FEIS Preferred Alternative (Proposed BLRT Extension Project) is a refined version of the Draft EIS (DEIS) locally preferred alternative (LPA). The FEIS identifies the process used and the rational for the changes made to LPA since the DEIS. The FEIS Preferred Alternative, in part, includes the following features:

- 11 new stations (includes stations at both Golden Valley Road and Plymouth Avenue),
- Approximately 1,675 additional park-and-ride spaces at four new lots,
- Accommodations for passenger drop-off facilities,
- New or restructured local bus routes connecting stations to nearby residential, commercial, and educational land uses,
- One Operation and Maintenance Facility (OMF) in Brooklyn Park at 101st Avenue and new Xylon Avenue North, and
- 17 Traction Power Substations (TPSSs).

The proposed BLRT Extension project begins at the Target Field Station in downtown Minneapolis and follows Olson Memorial Highway west to the BNSF rail corridor just west of Thomas Avenue, where it enters the BNSF right-of-way. Adjacent to the freight rail tracks, it continues in the rail corridor through the cities of Golden Valley, Robbinsdale, Crystal, and into Brooklyn Park. It then crosses Bottineau Boulevard at 73rd Avenue to West Broadway Avenue and terminates just north of TH 610 near the Target North Campus.

Mobile Source Air Toxics (MSATs) / Air Toxics: A qualitative mobile source air toxics impacts analysis is presented FEIS. Table ES-3 Summary of Impacts and Mitigation Measures (page ES-41) does not identify the specific measures that will be undertaken to reduce short-term construction impacts to air quality during the three year construction period.

> Recommendation: Because MSATs can cause adverse health impacts, especially to vulnerable populations such as children, the elderly, and those with existing respiratory health issues, EPA recommends the Record of Decision (ROD) identify the mitigation measures that FTA and/or the project proponents will require in order to decrease the exposure of these populations to MSATs emissions during construction. Such measures may include, but need not be limited to, strategies to reduce diesel emissions, such as project construction contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels, and limits on the length of time equipment is allowed to idle when not in active use (EPA recommends idling not exceed 5 minutes).

Stormwater Management and Wetlands: Many wetlands are proposed to be utilized as basins for stormwater detention purposes. While some wetlands may have been historically excavated for detention, they should still be regulated and managed as natural wetlands. Also, any wetlands

that were excavated for detention but that have naturalized over time or those not actively used or maintained for detention should be regulated and managed as natural wetlands.

> Recommendations: EPA recommends that regulated wetlands not be allowed to be utilized for stormwater detention. We recommend FTA's ROD address this issue. In addition, the ROD should identify and commit to sustainable stormwater practices, such as rain gardens and the use of pervious or porous pavement that could be used at stations, TPSS sites, and the OMF facility to help manage stormwater.

Wildlife Crossings: EPA reiterates that bridges and upland culvert crossings are important for wildlife. EPA previously recommended that the types of potential wildlife crossing accommodations and locations be identified and discussed in the FEIS, and that the FEIS identify potential wildlife crossing accommodation locations on document Figures. The FEIS did not include any specific wildlife crossing information. Project commitments on page 5-117 are vague and non-committal. Page 6-38 (Summary Table of Mitigation) also does not mention, or commit to, installing wildlife crossings. Construction of wildlife crossings can improve habitat connectivity and benefit safety by reducing collisions between wildlife and transit vehicles.

> Recommendations: EPA recommends FTA commit in the ROD to specific considerations for crossings to promote wildlife. For example: On other Department of Transportation projects, EPA and Federal Highway Administration (FHWA) have previously agreed to a minimum width of 5-feet to be utilized in upland areas (i.e., dry areas wildlife will use to traverse beneath a bridge) adjacent to either side of the watercourse or wetland being bridged. Include specific considerations for culvert design to promote wildlife movement across the corridor and acknowledge that a lack of suitable habitat adjacent to culverts originally built for hydrologic function may prevent their use as potential wildlife crossing structures (Cain et al. 2003)[1]. EPA reminds FTA that this would not and does not preclude the installation of additional dry culvert structure(s) adjacent to a hydraulic (stream crossing) culvert installation. These adjacent dry culvert structures would act as wildlife corridors, and allow for upland wildlife movement through these adjacent dry culverts in areas where the only alternative for fauna would otherwise be to traverse through flowing water conditions, which many animals will not do.

Forest/Tree Mitigation: EPA had previously recommended the FEIS include information regarding tree removal and proposed mitigation. The FEIS does not provide this information. However, EPA understands (FEIS Appendix D) that the Council is currently conducting a survey of existing trees that may be affected by project construction, to be completed in the early fall of 2016.

> Recommendations: We recommend the ROD quantify acreage and number of upland trees to be removed by the project. EPA recommends further coordination with the U.S. Fish and Wildlife Service (USFWS), Minnesota Department of Natural Resources (MnDNR), and

[1] Reference source: Cain, A.T., V.R. Tuovila, D.G. Hewitt, and M.E. Tewes. 2003. Effects of a highway and mitigation projects on bobcats in Southern Texas. Biological Conservation 114: 189-197.

local municipalities regarding providing voluntary upland forested mitigation for these losses. Include specific information on what forest mitigation is being offered (e.g., a summary of mitigation ratios, a summary of how mitigation will be offered). If applicable, the ROD should differentiate forest mitigation provided for bat habitat impacts from forest mitigation provided for impacts to upland forest.